

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: **MAY 24 1990**

SUBJECT: ACTION MEMORANDUM - Request for Removal Action at the Satterlee-Sumpter Township Landfill Site, Belleville, Michigan (Site ID #GM)

FROM: Jason El-Zein, On-Scene Coordinator *Jason el-Zein*  
Emergency and Enforcement Response Branch - Section I

TO: Norman R. Niedergang, Acting Associate Division Director  
Office of Superfund

THRU: Robert J. Bowden, Chief *Robert J. Bowden for*  
Emergency and Enforcement Response Branch

PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to \$116,600 to mitigate threats to public health and the environment which are posed by the presence of hazardous materials located at 40195 Judd Road, Belleville, Michigan. This is a time critical removal action. The response action hereby proposed is the removal of up to 70 drums of ignitable and paint-related wastes. An extensive soil contamination study must be conducted and, if the analysis confirms soil contamination, a ceiling increase for this removal action will be requested. The project will require an estimated eight on-site working days to complete.

The site is not on the National Priorities List (NPL).

ENDANGERMENT FINDING

Conditions existed at the site which, if not addressed by implementing the response action documented in this Action Memorandum, will lead to an imminent and substantial endangerment to the public health or welfare or the environment.

BACKGROUND

The Satterlee-Sumpter Township Landfill (SSTL) site is located in a rural residential area at 40195 Judd Road at the southeast corner of the intersection of Judd Road and Carleton West Road. The site is a combination of two sites; Satterlee-Sumpter Township Landfill and Lyle's Trucking. The sites were combined into one site because Lyle's Trucking is atop the landfill. The site was a licensed landfill for general refuse and commercial wastes.

EPA Region 5 Records Ctr.



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According to Michigan Department of Natural Resources (MDNR) files, Lyle Zilka of Lyle's Trucking Company took over operation of the site in 1975. During this period, the site was primarily used as a storage area for 55-gallon drums of liquid industrial wastes. Lyle's Trucking also used the site for a barrel crushing operation which included drums containing paints, solvents and oils. In 1979, Lyle Zilka entered into a consent agreement with MDNR and removed approximately 8,000 drums and 1/2 inch of top soil within a 4-acre area.

On August 11, 1989, the MDNR Environmental Response Division contacted the United States Environmental Protection Agency (U.S. EPA) and requested assistance in evaluating the threats posed by the SSTL site.

On September 9, 1989, the U.S. EPA tasked the Technical Assistance Team (TAT) to conduct a site assessment and evaluate the threats to human health and environment. On September 15, 1989, the TAT inspected the site and confirmed the presence of approximately 70 drums. Many of these drums were staged in small groups scattered throughout the site. Also, the TAT documented the presence of several empty tanks of various sizes, crushed drums, and junk automobiles. Several drums located on a large concrete pad were leaking paint-like materials. Volatile organic vapor readings (HNU) of up to 900 units (ppm) were detected above these drums.

On January 12, 1990, On-Scene Coordinator (OSC) Jason El-Zein accompanied the TAT during collection of samples of suspected waste from the site. Three soil samples and four drum samples were collected. Drum analyses confirmed the presence of RCRA waste (ignitable characteristic - flashpoint <90°F). Soil analyses were negative, however, more soil samples are needed since the ground was covered with snow during the sample collection and TAT had observed stained soils during the site assessment on September 15, 1989.

The site is accessible through a dirt driveway which is not restricted by a fence or a gate.

#### THREAT

The documented conditions at the SSTL site meet the criteria for a removal action as stated in the National Contingency Plan (NCP), Section 300.415 (b)(2). Specifically:

- 1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;

Access to the SSTL site is essentially unrestricted. It is located next to a rural residential area where young children had constructed a play fort next to some leaking drums. The potential for exposure to hazardous wastes is possible by persons and/or animals which come into direct contact with these drums. Also, there are no signs to warn of the presence of a potential or actual threat of exposure at the site.

2) Hazardous substances of pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

- The drums containing ignitable and paint-related wastes are severely rusted, leaking, and broken open. Several drums have leaked on to the ground. Ignitable wastes (flashpoints <90°F) have been identified by U.S. EPA's sampling on January 12, 1990.

3) Threat of fire or explosion;

Samples collected on January 12, 1990, show ignitable materials (flashpoint <90°F); therefore, an ignition source could initiate an on-site fire and/or explosion and cause a release of burning waste or by-product compounds to the atmosphere which may migrate to nearby residential areas. The presence of large quantities of flammable organics increases the risks of fire and/or explosions.

ENFORCEMENT

See confidential enforcement information in Attachment I.

PROPOSED PROJECT AND COSTS

The objective of this removal is to mitigate an imminent threat to human health and to the environment. The removal activities are expected to require eight on-site working days to complete. The removal of drums is consistent with any long-term remedial action and is recommended by the MDNR. The following removal steps are proposed at the site:

- 1) Develop and implement site safety and health plan.
- 2) Implement an air monitoring program.
- 3) Identify, stage, and sample the contents of all drums and containers.
- 4) Overpack any bulging and corroded drums.
- 5) Transport and dispose of all drums of hazardous waste at secure off-site disposal facilities.
- 6) Collect soil samples from stained soil areas.
- 7) Ship soil samples for analysis and evaluate results.

The detailed cleanup contractor costs are presented in Attachment II and estimated project costs are summarized below:

EXTRAMURAL COSTS

Cleanup Contractor	\$ 71,000.00
Contingency (15%)	<u>10,650.00</u>
Subtotal	\$ <u>81,650.00</u>
TAT/TES	<u>8,000.00</u>
Extramural Subtotal	\$ <u>89,650.00</u>
Extramural Contingency (15%)	<u>13,450.00*</u>
TOTAL, EXTRAMURAL COSTS:	\$103,100.00

INTRAMURAL COSTS

U.S. EPA Direct Costs (\$30/hr x 160 Regional hrs + 16 Hq. hrs)	\$ 5,300.00
U.S. EPA Indirect Costs (\$51/hr x 160 Regional hrs)	<u>8,200.00</u>
TOTAL, INTRAMURAL COSTS:	\$ 13,500.00
TOTAL REMOVAL PROJECT CEILING ESTIMATE:	\$116,600.00


\*This amount may be split as needed between ERCS and TAT/TES.

RECOMMENDATION

This decision document represents the selected removal action for the Satterlee-Sumpter Township Landfill (SSTL) site in Belleville, Michigan, developed in accordance with CERCLA as amended by SARA, and to extent practicable, the National Contingency Plan. This decision is based on the Administrative Record for the site. (Attachment III indexes the items that comprise the Administrative Record upon which the selection of the removal action is based.)

Because the conditions at the SSTL site in Belleville, Michigan meet the National Contingency Plan, Section 300.415, criteria for a removal action, your approval of this request is recommended. The estimated total project costs are \$116,600.00 of which up to \$95,100.00 (\$71,000+\$10,650+\$13,450) may be used for extramural cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:

  
Acting Associate Division Director  
Office of Superfund

DATE: 5/31/90

DISAPPROVE:

\_\_\_\_\_  
Acting Associate Division Director  
Office of Superfund

DATE: \_\_\_\_\_

cc: S. Janowiak, OS-210  
L. Peterson/J. Tielech, 5CS-TUB-3  
A. Baumann, 5HS-10  
R. Powers/R. Buckley, 5HS-GI  
R. Bowden, 5HS-12  
P. Schafer, 5HS-12  
R. Mancos, 5HS-12  
L. Fabinski, ATSDR, 5HS-12  
O. Warnsley, RP/CRU, 5HS-12  
T. Lesser, 5PA-14  
J. El-Zein, OSC, 5HS-GI  
L. Martinez, 5MCC-TUB-4  
EERB Read File  
EERB Delivery Order File  
EERB Site File

ATTACHED:

Redacted information not relevant to selection of General & family.

ATTACHMENT II

DETAILED CLEANUP CONTRACTOR COST ESTIMATE  
SATTERLEE-SUMPTER TOWNSHIP LANDFILL  
BELLEVILLE, MICHIGAN

The estimated cleanup contractor costs are as follows:

ERCS personnel	\$ 15,000
ERCS equipment	11,000
ERCS subcontractors	15,000
Transportation and disposal	30,000
Total	<u>\$ 71,000</u>

ATTACHMENT III

INDEX TO THE ADMINISTRATIVE RECORD  
SATTERLEE-SUMPTER TOWNSHIP LANDFILL (SSTL)  
BELLEVILLE, MICHIGAN

<u>Title</u>	<u>Author</u>	<u>Date</u>	<u>Subject</u>	<u>No. of pages</u>
1. Site Assessment	Roy F. Weston, Inc.	Nov. 10, 1989	Site inspection	16
2. Soil and Drums sampling Results	Analytic & Biological Laboratories, Inc.	Jan. 24, 1990	Analytical Results	17
3. Action Memo	Jason El-Zein		Request for funds for Removal Actions at SSTL	
4. Abandoned Drums	Dipo Oylmsan	August 11, 1989	MDNR letter advising U.S. EPA of the presence of the abandoned suspected waste drums	2